REMARKS

The applicant has carefully considered the official action dated August 18, 2005, and the references it cites. In the official action, claims 38, 39, 42-47, 50-55, 58-75, 77, 81-85, 88-94, 97, 98, 101, 103-105, 109, 111-113, 116, and 117 were rejected under 35 U.S.C. § 102(b) as anticipated by Bradlee (4,794,773); claims 76, 78-80, 86, 95, 96, 99, 100, 102, 106-108, 110, 114, and 115 were rejected under 35 U.S.C. § 103(a) as unpatentable over Bradlee; claims 61-63, 69-72, 74, 75, 77, 79-82, 84-86, 88, 89, 91, 92, 96, 98, 101, 103, 104, 108, 109, 113, and 115-117 were rejected under 35 U.S.C. § 102(b) as anticipated by Jeuniaux et al.; and claims 38, 39, 41-55, 57-60, 64-68, 73, 76, 78, 83, 90, 93-95, 97, 99, 100, 102, 105-107, 110-112, and 114 were rejected under 35 U.S.C. § 103(a) as unpatentable over Jeuniaux et al. By way of this response, claims 38, 39, 46, 47, 54, 55, 61-67, 69, 71, 72, 74, 76-78, 85, 86, 88, 92, 95-97, 109, 110, and 112-117 have been amended to clarify the scope of protection sought. No new matter has been added. Accordingly, claims 38, 39, 41-47, 49-55, 57-86, 88-117 are pending and at issue in this application, of which claims 38, 46, 54, 61, 72, 77, 85, 92, 101, 109, and 113 are independent. In view of the foregoing amendments and the following remarks, the applicant respectfully traverses the rejections and submits that all pending claims are in condition for allowance. Favorable reconsideration is respectfully requested.

The applicant respectfully submits that independent claim 38 is allowable over the art of record. Claim 38 is directed to a method that recites, *inter alia*, determining a difference between a first wave height of a material in a first longitudinal zone and a second wave height of the material in a second longitudinal zone and adjusting a load applied to the material as the material moves based on the travel length information and the difference

between the first and second wave heights. None of the art of record teaches or suggests determining a difference between a first wave height of a material in a first longitudinal zone and a second wave height of the material in a second longitudinal zone and adjusting a load applied to the material based on the difference between the first and second wave heights.

Bradlee describes determining a radius of curvature of a sheet material that is subsequently used to reduce camber in the sheet material. Jeuniaux et al. teach measuring the shape and/or the length of a fiber of a strip. However, neither determining the radius of curvature as described by Bradlee nor measuring the shape and/or the length of a fiber of a strip as described by Jeuniaux et al. constitutes determining a first wave height of a material in a first longitudinal zone and a second wave height of the material in a second longitudinal zone and adjusting a load applied to the material based on the difference between the first and second wave heights, as recited in claim 38. Accordingly, the applicant respectfully submits that independent claim 38 and claims 39 and 41-45 dependent thereon are in condition for allowance.

Independent claims 46 and 54, are also allowable over the art of record for at least the reasons described above in connection with claim 38. Accordingly, the applicant respectfully submits that independent claims 46 and 54 and all claims dependent thereon are in condition for allowance.

Independent claim 61 is also allowable over the art of record. Claim 61 is a method claim reciting, *inter alia*, determining a first wave height of a surface of a material associated with a first zone and a second wave height of the surface of the material associated with a second zone and automatically varying a roll plunge associated with the first zone by an amount calculated using the second wave height to modify a condition of the material. None

of the art of record teaches or suggests determining a first wave height of a surface of a material associated with a first zone and a second wave height of the surface of the material associated with a second zone and automatically varying a roll plunge associated with the first zone by an amount calculated using the second wave height to modify a condition of the material, as recited in claim 61. Accordingly, the applicant respectfully submits that independent claim 61 and claims 62-71 dependent thereon are in condition for allowance.

Independent claim 72 is also allowable over the art of record. Specifically, none of the art of record teaches or suggests a system having a first sensor separated by a first distance from a surface of the moving material, a second sensor separated by a second distance from the surface of the moving material, a controller communicatively coupled to the first and second sensors and configured to compare the first distance to the second distance, and a roller operatively coupled to the controller, wherein the controller varies a position of the roller based on the comparison to vary a load applied to the moving material to condition the moving material, as recited in claim 72. Accordingly, the applicant respectfully submits that independent claim 72 and claims 73-76 dependent thereon are in condition for allowance.

Independent claim 77 is also allowable over the art of record. Specifically, none of the art of record teaches or suggests moving a strip material past a first sensor associated with a first longitudinal zone along a length of the strip material and a second sensor associated with a second longitudinal zone along the length of the strip material, obtaining a first plurality of readings from the first sensor and a second plurality of readings from the second sensor, determining a first wave height value based on at least one of the first plurality of readings and a second wave height value based on at least one of the second plurality of

readings, and generating an electrical signal to cause an adjustment of a load applied to the strip material in response to comparing the first and second wave height values. Accordingly, the applicant respectfully submits that independent claim 77 and claims 78-84 dependent thereon are in condition for allowance.

Independent claim 85 is also allowable over the art of record. Claim 85 is a method claim reciting, *inter alia*, determining a certification level indicative of a condition of a material based on topographical information. None of the art of record teaches or suggests determining a certification level indicative of a condition of a material based on topographical information, as recited in claim 85. Accordingly, the applicant respectfully submits that independent claim 85 and claims 86 and 88-91 are in condition for allowance.

Independent claim 92 is also allowable over the art of record. Specifically, none of the art of record teaches or suggests an apparatus having a first sensor positioned to measure a first height value of a surface of the material, a second sensor positioned to measure a second height value of the surface of the material, and a controller operatively coupled to a roller and the first and second sensors, wherein the controller is configured to generate an electrical signal in response to a comparison of the first height value and the second height value to condition the material. Accordingly, the applicant respectfully submits that independent claim 92 and claims 93-100 dependent thereon are in condition for allowance.

Independent claim 101 is also allowable over the art of record. Specifically, none of the art of record teaches or suggests adjusting a load applied to a first zone of a material based on a comparison of a first deviation value associated with a material condition of a first zone and a second deviation value associated with a material condition of a second zone. Even if the examiner is correct in his contention that Bradlee describes determining a

deviation value at column 5, equation 8, the examiner has not presented evidence indicative of adjusting a load applied to a first zone of a material based on a comparison of first and second deviation values, as recited in claim 101. Further, none of the art of record teaches or suggests adjusting a load applied to a first zone of a material based on a comparison of first and second deviation values. Accordingly, the applicant respectfully submits that independent claim 101 and claims 102-108 dependent thereon are in condition for allowance.

Independent claim 109 is also allowable over the art of record. Specifically, none of the art of record teaches or suggests determining a first height value based on a first plurality of sensor readings associated with a first zone of a material as the material moves, determining a second height value based on a second plurality of sensor readings associated with a second zone of the material as the material moves, and adjusting a load applied to the material in the second zone to condition the material in the first zone as the material moves based on a comparison of the first and second height values, as recited in independent claim 109. Accordingly, the applicant respectfully submits that independent claim 109 and claims 110-112 dependent thereon are in condition for allowance.

Independent claim 113 is also allowable over the art of record. Specifically, none of the art of record teaches or suggests a method including determining a first I-unit value indicative of a condition of a material and adjusting a load applied to a zone of the material as the material moves based on a comparison of the first I-unit value to an I-unit threshold value, as recited in claim 113. Accordingly, independent claim 113 and claims 114-117 dependent thereon are in condition for allowance.

In view of the foregoing, the applicant respectfully requests reconsideration of this application. If there are any remaining matters that the examiner would like to discuss, the examiner is invited to contact the undersigned representative at the telephone number set forth below.

Respectfully submitted,

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Mark G. Hanley
Reg. No. 44,736
Attorney for Applicant
Hanley, Flight & Zimmerman, LLC
(at customer number **34431**)
20 North Wacker Drive
Suite 4220
Chicago, Illinois 60606
312.580.1020